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*Attorneys for Credit Protection Trusts 207 and 283*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	<b>Case No. 08-13555 (JMP)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
-----	X	
<b>CREDIT PROTECTION TRUST 207 AND</b>	:	
<b>CREDIT PROTECTION TRUST 283,</b>	:	
	:	
<b>Movants,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>LEHMAN BROTHERS HOLDINGS INC. AND</b>	:	
<b>LEHMAN BROTHERS SPECIAL FINANCING INC.,</b>	:	
	:	
<b>Respondents.</b>	:	
-----	X	

**NOTICE OF MOTION OF CREDIT PROTECTION TRUSTS 207 AND  
283 FOR ORDER PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE  
60(b)(1) AND (4), BANKRUPTCY RULE 9024, AND BANKRUPTCY CODE  
SECTION 105(a) GRANTING RELIEF FROM CONFIRMATION ORDER**

PLEASE TAKE NOTICE that upon this notice of motion and the accompanying memorandum of law and declarations of Jonathan P. Meyers and Jeffrey Chubak, Credit Protection Trusts 207 and 283 (together, the “Moving Trusts”) hereby move this Court for an order pursuant to Rule 60(b)(1) and (4) of the Federal Rules of Civil Procedure, Rule 9024 of the

Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and section 105(a) of title 11 of the United States Code granting the Moving Trusts relief from the order, entered December 6, 2011 [Docket No. 23023], confirming the modified third amended joint chapter 11 plan of Lehman Brothers Holdings Inc. and its affiliated debtors (the “Debtors”).

PLEASE TAKE NOTICE that a hearing in respect of the motion will be held on **September 19, 2012 at 10:00 a.m. (prevailing Eastern Time)** (the “Hearing”) before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 601, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that any response or objection to the motion must comply with the Bankruptcy Rules, the Local Bankruptcy Rules for the Southern District of New York, and the second amended order implementing certain notice and case management procedures, entered June 17, 2010 [Docket No. 9635], be filed with the Court electronically by registered users of the Court’s electronic case filing system or on a 3-½ inch disk by all other parties in interest, and served, so as to be received no later than **September 12, 2012 at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”), upon: (a) the chambers of the Honorable James M. Peck, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004; (b) attorneys for the Debtors, Jones Day, 222 East 41st Street, New York, New York 10017, Attn: Aviva Warter Sisitsky; (c) attorneys for the unsecured creditors’ committee, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: David S. Cohen and Evan Fleck; (d) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Tracy Hope-

Davis, Elisabetta Gasparini, and Andrea Schwartz; and (e) attorneys for the Moving Trusts, Proskauer Rose LLP, Eleven Times Square, New York, New York 10036, Attn: Martin J. Bienenstock, Irena M. Goldstein, and Jeffrey Chubak.

PLEASE TAKE FURTHER NOTICE that if no response or objection to the motion is filed and served prior to the Objection Deadline, the motion shall be deemed unopposed and the Court may enter an order granting the relief sought without a Hearing.

PLEASE TAKE FURTHER NOTICE that any party filing a response or objection to the motion is required to attend the Hearing, and failure to attend the Hearing may result in the motion being granted upon default.

Dated: August 24, 2012  
New York, New York

/s/ Martin J. Bienenstock  
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